EXHIBIT B FILED UNDER SEAL

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1
                    UNITED STATES DISTRICT COURT
 2
                  NORTHERN DISTRICT OF CALIFORNIA
 3
                       SAN FRANCISCO DIVISION
 4
                                    )
 5
     WAYMO LLC,
 6
                Plaintiff,
 7
               vs.
                                    )Case No.:
                                    )3:17-cv-00939-WHA
 8
     UBER TECHNOLOGIES, INC.,
     OTTOMOTTO LLC; OTTO TRUCKING )
 9
     LLC,
                                    )
                                    )
10
               Defendants.
11
12
13
                        ATTORNEYS' EYES ONLY
14
              VIDEOTAPED DEPOSITION OF JAMES HASLIM
15
                     San Francisco, California
16
                      Tuesday, April 18, 2017
17
                               Volume 1
18
19
20
21
22
23
    Reported by:
    RACHEL FERRIER, CSR No. 6948
24
    Job No. 2597892
25
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1 MR. KIM: Objection; form. 10:4	
mk. kim: Objection; torm.	11:07
2 THE WITNESS: That's my understanding. 10:4	11:08
3 BY MR. JAFFE: 10:4	11:09
Q Okay. How much are the diodes 10:4	11:14
5	11:17
6 A I'm not sure I know the number. 10:4	11:18
7 Q Is it a 10:4	11:22
8 A I wouldn't be surprised if it was 10:4	11:23
9 10:4	11:26
Q Okay. And to go back to my earlier question, the 10:4	11:27
11 Fuji design, in total, has 10:4	11:34
12 ; right? 10:4	11:37
MR. KIM: Objection; form. 10:4	11:39
THE WITNESS: That is the current design. 10:4	11:40
15 BY MR. JAFFE: 10:4	11:48
Q Okay. How are the diodes aligned with respect 10:4	11:49
to for manufacturing purposes with respect to each 10:4	11:54
18 other? 10:4	12:00
MR. KIM: Objection; form. 10:4	12:01
THE WITNESS: 10:4	12:02
21	12:07
22	12:11
23 BY MR. JAFFE: 10:4	12:14
Q And there's a you provide an X/Y coordinates 10:4	12:15
to the manufacturer; right, for each of the laser 10:4	12:18
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1	diodes	?	10:42:20
2	A	Yes.	10:42:21
3	Q	And what are the X/Y coordinates mapped to?	10:42:21
4	- A	They are referenced to fiducial marks on the PCB.	10:42:25
5	Q	And have you ever used holes for those?	10:42:30
6	A	Sorry?	10:42:35
7	Q	For the fiducials, have you ever used a hole as a	10:42:36
8	fiduci	al?	10:42:42
9	A	No. We have always placed the laser diodes using	10:42:43
10	the me	tal fiducial marks on the PCB.	10:42:46
11	Q	And who came up with that idea?	10:42:48
12		MR. KIM: Objection; form.	10:42:50
13		THE WITNESS: I believe it's standard practice in	10:42:51
14	PCB ma	nufacture.	10:42:54
15	BY MR.	JAFFE:	10:42:56
16	Q	So who came up with using it for Fuji?	10:42:56
17	A	I don't know.	10:42:58
18	Q	Okay. When did that design come up?	10:42:59
19	A	I don't remember the exact date, but I think you	10:43:03
2.0	sugges	ted there was a certain time frame. Did you say	10:43:09
21	Decemb	er when boards went out? It would be in that	10:43:11
22	approx	imate time frame.	10:43:17
23	Q	Well, just to be clear, I'm looking to your	10:43:17
24	testime	ony about this	10:43:20
25	A	I understand.	10:43:20
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11:16:19 2				
3 recounted the sequence of events and 4 5 Q And what transpired? 6 A Oh, it would help to go back, but, basically, I'm 11:16:29 7 announcing to my team that we are making a major pivot 11:16:35 8 in our design approach. 11:16:43 10 11:16:47 11 11:16:50 12 Q And what happened? 11:16:51 13 A 11:16:51 14 11:17:05 16 11:17:05 17 18 11:17:15 18 11:17:16 19 11:17:27 20 11:17:27 21 22 Q 11:17:27 23 11:17:27 24 A Yes. 11:17:31	1	there?		11:16:19
11:16:24 Q And what transpired? A Oh, it would help to go back, but, basically, I'm 11:16:29 announcing to my team that we are making a major pivot 11:16:35 in our design approach. 11:16:47 11:16:50 Q And what happened? 11:16:51 A 11:16:51 14 11:17:05 16 11:17:05 17 11:17:15 18 11:17:16 19 11:17:16 10 11:17:27 21 11:17:27 22 A Yes. 11:17:27	2	A Oh, if I had him face-	to-face, I would have	11:16:19
S Q And what transpired? A Oh, it would help to go back, but, basically, I'm 11:16:29 announcing to my team that we are making a major pivot 11:16:35 in our design approach. 11:16:47 11:16:50 12 Q And what happened? 11:16:51 13 A 11:16:51 14 11:17:01 15 11:17:05 16 11:17:12 17 11:17:15 18 11:17:15 19 11:17:16 20 2 11:17:27 21 22 Q 11:17:27 22 A Yes. 11:17:31	3	recounted the sequence of eve	nts and	11:16:21
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19	17			11:17:15
20	18			11:17:16
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23 11:17:29 24 A Yes. 11:17:31	21			11:17:26
24 A Yes. 11:17:31	22	Q		11:17:27
	23			11:17:29
Q And then did you tell him, "We are not doing 11:17:32	24	A Yes.		11:17:31
	25	Q And then did you tell	him, "We are not doing	11:17:32
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